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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**
13

14 PURE PARLAY, LLC a Nevada Limited
15 Liability Company,

16 Plaintiff,

17 v.

18 STADIUM TECHNOLOGY GROUP,
19 INC., a Nevada corporation, and GVC
20 HOLDINGS, PLC, a company
21 incorporated in the Isle of Man,

22 Defendants.
23

Case No.: 2:19-cv-00834-GMN-BNW

**STIPULATION TO AMEND
SCHEDULING ORDER**

(FIRST REQUEST)

24 Plaintiff PURE PARLAY, LLC, (“Plaintiff”) and Defendants Stadium Technology
25 Group, Inc., and GVC Holdings, PLC (collectively referred to as “Defendants”), by and through
26 their respective undersigned counsel of record, stipulate and agree to amend the current
27 Scheduling Order by moving all relevant dates back 120 days.

28 Pursuant to Fed. R. Civ. P. 26(f), LR 26-1, and Local Patent Rules 1-1 et. seq., on
October 30, 2019 counsel for the parties conducted a telephonic discovery-planning conference
and submitted scheduling dates which are currently set forth in the Scheduling Order signed by
the Court. (Dkt. No. 28). However, the parties agree that the dates in the Scheduling Order need
to be amended to account for the current status of the case.

On February 5, 2020, the Court granted Defendants’ Motion to Dismiss Plaintiff’s first
amended complaint providing Plaintiff with leave to file a second amended complaint within 21
days. (Dkt. No. 34). On February 24, 2020, Plaintiff filed its second amended complaint. (Dkt.

No. 37). On February 27, 2020, the parties filed a first stipulation to extend the time for Defendants to file a response to Plaintiff's second amended complaint until March 30, 2020. (Dkt. No. 38). On February 28, 2020, the Court granted the first extension of time. (Dkt. No. 39). On March 17, 2020, based on the impact of the COVID-19 virus, the parties filed a second stipulation to extend the time for Defendants to file a response to Plaintiff's second amended complaint until April 17, 2020. (Dkt. No. 41). On March 19, 2020, the Court granted the second extension of time. (Dkt. No. 42).

Consequently, as it stands, Defendants have not responded to the second amended complaint and have until April 17, 2020 to do so. The parties agree and propose that the relevant dates in the current Scheduling Order be moved back 120 days, as set forth below, to account for the current status of the case. The new dates also contemplate moving back the Pre-Claim Construction Settlement Conference currently scheduled for March 31, 2020. Three new dates for the Pre-Claim Construction Settlement Conference are proposed herein. The Additional Provisions set forth in the current Scheduling Order to remain unchanged.

Event	New Proposed Deadline
Exchange of Rule 26(a) Initial Disclosures	January 7, 2020 - completed
Joint Protective Order	January 7, 2020 - completed
Disclosure of LPR 1-6 Infringement Contentions and LPR 1-7 Document Production Accompanying Infringement Contentions	May 21, 2020
Disclosure of LPR 1-8 Non-Infringement, Invalidity, and Unenforceability Contentions and LPR 1-9 Document Production Accompanying Non-Infringement, Invalidity, and Unenforceability Contentions	July 6, 2020
Disclosure of LPR 1-10 Response to Non-Infringement, Invalidity, and Unenforceability	July 20, 2020

1	Contentions	
2	Exchange of LPR 1-13 Proposed Terms for Construction	August 17, 2020
3		
4	Exchange of LPR 1-14 Preliminary Claim Constructions and Extrinsic Evidence	September 1, 2020
5		
6	Parties to Submit LPR 1-15 Joint Claim Construction and Prehearing Statement	September 15, 2020
7		
8	Plaintiff to File LPR 1-16 Opening Claim Construction Brief	October 5, 2020
9		
10	Defendant to File LPR 1-16 Responsive Claim Construction Brief	October 26, 2020
11		
12	Plaintiff to File LPR 1-16 Reply Claim Construction Brief	November 3, 2020
13		
14	Deadline to File Motion to Amend Pleadings/Parties	November 10, 2020
15		
16	Claim Construction Tutorials, Hearing, and Order from the Court	TBD by the Court
17		
18	Fact Discovery Cut-off	45 days after entry of Claim Construction Order
19		
20		
21	Opening expert reports on issues for which the serving party has the burden of proof	30 days after close of fact discovery
22		
23	Rebuttal expert reports, on issues for which the other party has the burden of proof	30 days after service of opening expert reports
24		
25	Reply expert reports limited to responses on expert opinions on secondary considerations	15 days after service of rebuttal expert reports
26		
27	Expert Discovery Cut-off	45 days after service of rebuttal expert reports
28		

Dispositive Motion Deadline

30 days after the close of expert discovery

Additionally, the parties propose the following dates for the settlement conferences called for by the Local Rules:

Event	Deadline
Proposed Dates for Pre-Claim Construction Settlement Conference	April 14, 2020 April 21, 2020 April 28, 2020
Post-Claim Construction Settlement Conference	Within 30 days after entry of claim construction order
Pre-Trial Settlement Conference	Within 30 days after filing of pretrial order

DATED this 22ND day of March 2020.

Respectfully submitted,
FISHERBROYLES, LLP

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IT IS ORDERED that ECF No. 43 is
GRANTED.

IT IS FURTHER ORDERED that the
Pre-Claim Construction Settlement
Conference is rescheduled to April 21,
2020. The pre-settlement conference
call is rescheduled to April 20, 2020 at
3:00 p.m. Settlement conference
statements must be emailed to
chambers per ECF No. 40 by 4:00 p.m.
on April 13, 2020.

IT IS SO ORDERED

DATED: March 23, 2020



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of March 2020, a true and correct copy of the foregoing **STIPULATION TO AMEND SCHEDULING ORDER** was served electronically on all interested parties via the Court's CM/ECF System as follows:

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